

EPA/DEQ Hazardous Waste Program
Issue Resolution Process
Last updated: May 5, 2011

DEQ and Region 10 staff agree to work cooperatively to resolve any issues that arise between the agencies during the implementation of the Resource Conservation and Recovery Act (RCRA). The intent of both agencies is to identify and clearly articulate areas of disagreement and to resolve those areas of disagreement at the lowest level possible. Where issues cannot be resolved at the program staff level, they will be elevated to the appropriate managers within both agencies.

After failing to reach consensus, each agency will elevate issues as follows.

DEQ's process for elevating issues:

- The Hazardous Waste Program Management Team (PMT) will prepare an issue statement documenting the areas of disagreement and the program's position and share it with the Land Quality Division Administrator. At the same time, DEQ will inform Region 10 of its decision to elevate the issue beyond program-level management and share the issue statement with EPA.
- The Division Administrator will review the issue and will either defer the issue back to the PMT for program-level resolution, with guidance, or will engage in discussions with Region 10's Director of the Office of Air, Waste and Toxics or Office of Compliance and Enforcement.
- Issues that are of significance agency-wide may be elevated immediately by Division management, or following Division Administrator-level negotiations, to the Director of the Department.
- DEQ will make every effort to resolve issues as efficiently and effectively as possible.

EPA Region 10 process for elevating issues:

- Issues may arise from the Resource Management and RCRA State Programs Unit, the Air/RCRA Compliance Unit or the Corrective Action and Permits Team. The appropriate unit or team will prepare an issue statement documenting the areas of disagreement and EPA's

position and share it with the Office Directors for Air, Waste and Toxics or for Compliance and Enforcement. At the same time, EPA will inform DEQ of its decision to elevate the issue beyond program-level management and will share the issue statement with DEQ.

- The concerned Office Director will review the issue and will either defer the issue back to the appropriate unit or team, with guidance, or will engage in discussions with the DEQ Land Quality Division Administrator.
- Issues that are of significance agency-wide may be elevated immediately by the Office Director or, following Director/Administrator –level negotiations, to the Regional Administrator.
- EPA will make every effort to resolve issues as efficiently and effectively as possible.